

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:)	CASE NO. 18-42189-BEM
)	
Anthony David Luke and)	
Stacy Dawn Merritt-Luke,)	CHAPTER 13
)	
Debtors.)	

MOTION TO INCUR NEW DEBT BY PURCHASING AUTOMOBILE

COME NOW Anthony David Luke and Stacy Dawn Merritt-Luke, Debtors in the above-styled Chapter 13 case, by and through counsel, file this "Motion to Incur Debt", and show this honorable court the following:

1.

Debtors filed the petition for relief in the above-styled Chapter 13 case on September 17, 2018. The Chapter 13 plan has not yet been confirmed.

2.

Debtors wish to incur new debt to purchase an automobile to provide for their transportation needs.

3.

Debtors are not able to attain financing without approval from the court. The terms on which the debtors will incur new debt by purchasing a vehicle are approximately as follows:

\$9,995 Financed, and a payment of \$175 biweekly.

4.

Debtors plan to purchase a 2008 Hyundai Santa Fe.

5.

Debtors will amend Schedules I & J to show that the loan repayment is feasible and that said monthly note will not impede their ability to fund their Chapter 13 Plan.

6.

Debtors believe that the purchase of this property is in the best interest of the estate and the creditors and that such purchase will assist in the effectuation of the Debtors' financial reorganization.

WHEREFORE, Debtors pray:

- (a) that this Motion be filed, read and considered;
- (b) that this Motion be granted; and,
- (c) that this Honorable Court grant such other and further relief as it deems just and proper.

This the 24th day of April, 2019.

Respectfully submitted,

_____/s/_____

Dan Saeger
Attorney for Debtors
Georgia Bar No. 680628

SAEGER & ASSOCIATES, LLC
706 S Thornton Ave. Ste. D
Dalton, GA 30720
(P) 706-529-5566
dan@whitfieldcountylaw.com



2208 SOUTH 41 HWY, DALTON, GA. 30720

PHONE: 706/275-6226 FAX: 706/226-6064

janddauto@hotmail.com

BUYERS ORDER

or similar

<u>2008</u>	<u>HYUNDAI</u>	<u>SANTA FE</u>
YEAR	MAKE	MODEL

<u>5NMSH13E38H152087</u>	<u>129652</u>
VIN	MILEAGE

FINANCE PRICE	<u>9995.00</u>	TAG/TITLE	<u>60.00</u>
CASH PRICE	<u> </u>	DOC FEES	<u>150.00</u>
ON TRADE	<u> </u>	DOWN PAYMENT	<u>1000.00</u>
SALES TAX	<u>210.38</u>	TOTAL PRICE	<u>12,986.71</u>
PAYMENT AMT	<u>175.00</u>	M/W/B/S	<u>Biweekly</u>

SALES MAN Alfonso Rodriguez

DATE 4/1/19

SIGNATURE Alfonso

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CERTIFICATE OF SERVICE

I certify that true and correct copies of Debtor's Motion to Incur Debt have been served upon the following by placing same in an envelope with adequate First Class postage affixed and depositing same in the United States Mail addressed for delivery to:

Mary Ida Townson
Chapter 13 Trustee
Suite 2200
191 Peachtree Street, NE
Atlanta, GA 30303-1740

Anthony David Luke
Stacy Dawn Merritt-Luke
203 W Hawthorne st
Dalton, GA 30720

And all creditors on the attached matrix.

This 24th day of April, 2019.

/s/ Dan Saeger
Dan Saeger
Attorney for Debtors
Georgia Bar No. 680628

SAEGER & ASSOCIATES, LLC
706 S Thornton Ave. Ste. D
Dalton, GA 30720
(P) 706-529-5566
dan@whitfieldcountylaw.com

Label Matrix for local noticing
113E-4

Case 18-42189-bem
Northern District of Georgia
Rome
Wed Apr 24 20:29:10 EDT 2019

Charles Jackson Bowen
The Bowen Law Group
Suite 1001
7 E Congress Street
Savannah, GA 31401-3357

Chattanooga Imaging
1710 Gunbarrel Rd
Chattanooga, TN 37421-3127

Credit Collection Service
PO Box 607
Norwood, MA 02062-0607

(p)DIRECTV LLC
ATTN BANKRUPTCIES
PO BOX 6550
GREENWOOD VILLAGE CO 80155-6550

Hamilton Medical Center
Attn: Collection Department
PO Box 1168
Dalton, GA 30722-1168

LVNV Funding, LLC its successors and assigns
assignee of MHC Receivables, LLC and
FNEM, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Mitchell & Mitchell, PC
PO Box 668
Dalton, GA 30722-0668

Online Information Services
PO Box 1489
Winterville, NC 28590-1489

Physicians Care
Premier Financial
5312 Brainerd Rd
Chattanooga, TN 37411-5327

Ad Astra Recovery
7330 W 33rd St N # 118
Wichita, KS 67205-9370

Capital Auto Finance
2759 Delk Rd SE
Marietta, GA 30067-8859

Credit Acceptance
25505 West Twelve Mile Rd
Suite 3000
Southfield MI 48034-8331

Credit One Bank
PO Box 98872
Las Vegas, NV 89193-8872

Emergency Coverage Corp
265 Brookview Centre Way
Knoxville, TN 37919-4049

IC Systems Collections
PO Box 64378
Saint Paul, MN 55164-0378

Anthony David Luke
203 W Hawthorne St
Dalton, GA 30720-3155

NGRCA
P O BOX 1949
DALTON, GA 30722-1949

Online Services
PO Box 1489
Winterville, NC 28590-1489

Premier Bankcard, Llc
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999

Ashley Funding Services, LLC its successors
assigns as assignee of Laboratory
Corporation of America Holdings
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587
Cash Express, LLC
345 South Jefferson Avenue, Suite 300
Cookeville, TN 38501-3456

Credit Acceptance Corporation
PO Box 5070
Southfield, MI 48086-5070

Dalton Utilities
1200 Vd Parrott Jr Pkwy
Dalton, GA 30721-3442

First Premier Bank
3820 N Louise Ave
Sioux Falls, SD 57107-0145

LVNV Funding LLC
c/o Resurgent Capital Services
PO Box 1269
Greenville, SC 29602-1269

Stacy Dawn Merritt-Luke
203 W Hawthorne St
Dalton, GA 30720-3155

North Georgia Regional Collection Agency
PO Box 1949
Dalton, GA 30722-1949

Physicians Care
403 McBrien Rd
Chattanooga, TN 37412-3223

Premier Financial
5312 Brainerd Rd
Chattanooga, TN 37411-5327

Progressive Leasing
256 W Data Dr
Draper, UT 84020-2315

Progressive Insurance Company
6300 Wilson Mills Rd
Mayfield Village, OH 44143-2182

Promise Pediatrics
375 Boynton Dr
Ringgold, GA 30736-2737

Robert Scott Rickman
Rickman & Associates, PC
Suite 200
1755 North Brown Road
Lawrenceville, GA 30043-8196

Dan Saeger
Saeger & Associates, LLC
Suite D
706 S Thornton Ave
Dalton, GA 30720-8212

Daniel R. Saeger
Rickman & Associates, P.C.
706 S Thornton Ave. Ste. D
Dalton, GA 30720-8212

Speedy Cash
5900 Brainerd Rd
Chattanooga, TN 37411-5515

(p)TMX FINANCE LLC FORMERLY TITLEMAX
15 BULL STREET
SUITE 200
SAVANNAH GA 31401-2686

Mary Ida Townson
Chapter 13 Trustee
Suite 2200
191 Peachtree Street, NE
Atlanta, GA 30303-1770

UNITED STATES DEPARTMENT OF EDUCATION
CLAIMS FILING UNIT
PO BOX 8973
MADISON, WI 53708-8973

US Dept of Ed/GLELSI
PO Box 7859
Madison, WI 53707-7859

Wakefield & Assoc.
PO Box 50250
Knoxville, TN 37950-0250

Wells Fargo Card Service
PO Box 14517
Des Moines, IA 50306-3517

Whitfield County Magistrate Court
Attention: Civil Clerk
PO Box 386
Dalton, GA 30722-0386

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Directv
PO Box 78626
Phoenix, AZ 85062-8626

Titlemax
301 N Glenwood Ave
Dalton, GA 30721-3114

(d)Titlemax of Georgia, Inc.
15 Bull Street
Suite 200
Savannah, GA 31401 United States

End of Label Matrix
Mailable recipients 43
Bypassed recipients 0
Total 43